

**Thacher  
Proffitt**

**MEMO ENDORSED**



Thacher Proffitt & Wood LLP  
Two World Financial Center  
New York, NY 10281  
212.912.7400

Fax: 212.912.7751  
[www.tpw.com](http://www.tpw.com)

Direct Dial: 212.912.7417  
[JDaherly@tpw.com](mailto:JDaherly@tpw.com)

July 25, 2007

**BY HAND**

The Honorable Denise Cote  
United States District Judge  
United States District Court for the Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 630  
New York, New York 10007-1312

**USDC SDNY  
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DATE FILED: 8-1-07**

Re: <i>DB Structured Products, Inc. v. Mortgage Corporation of America, Inc., d/b/a Zone Funding</i>	07 CV 4106
<i>DB Structured Products, Inc. v. Baltimore American Mortgage Corporation, Inc.</i>	07 CV 4109
<i>DB Structured Products, Inc. v. First Capital Mortgage Corp.</i>	07 CV 4115
<i>DB Structured Products, Inc. v. Prajna Group, Inc., d/b/a Liberty Mortgage Funding,</i>	07 CV 4116
<i>DB Structured Products, Inc. v. ACT Lending Corporation,</i>	07 CV 4117
<i>DB Structured Products, Inc. v. Commonsense Mortgage, Inc.,</i>	07 CV 4118 ←
<i>DB Structured Products, Inc. v. Lender Ltd,</i>	07 CV 4119
<i>DB Structured Products, Inc. v. Maribella Mortgage, LLC,</i>	07 CV 4120
<i>DB Structured Products, Inc. v. Lancaster Mortgage Bankers, LLC,</i>	07 CV 4121
<i>DB Structured Products, Inc. v. Great Northern Financial Group, Inc.,</i>	07 CV 4122
<i>DB Structured Products, Inc. v. Investaid Corporation,</i>	07 CV 4123
<i>DB Structured Products, Inc. v. Cameron Financial Group, Inc.,</i>	07 CV 4124
<i>DB Structured Products, Inc. v. Transnational Financial Network, Inc.,</i>	07 CV 4125
<i>DB Structured Products, Inc. v. Bayrock Mortgage Corporation,</i>	07 CV 4126
<i>DB Structured Products, Inc. v. iFreedom Direct Corporation, f/k/a New Freedom Mortgage Corporation.</i>	07 CV 4127

Dear Judge Cote:

Our firm is counsel to the Plaintiff in the fifteen referenced actions pending before Your Honor. We write to request an adjournment of the initial pre-trial conferences currently scheduled for August 3, 2007. Specifically, we request that the initial pre-trial conferences for the above cases be adjourned as follows:

New York, NY

Washington, DC

White Plains, NY

Summit, NJ

Mexico City, Mexico

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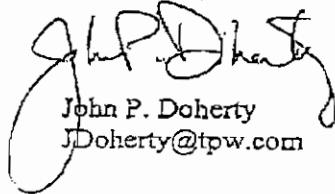
1. The conference for *DB Structured Products, Inc. v. Lender Ltd.*, 07 CV 4119 be adjourned to September 7, 2007 at 2:00 p.m.;
2. The conferences for *DB Structured Products, Inc. v. Great Northern Financial Group, Inc.*, 07 CV 4122 and *DB Structured Products, Inc. v. Transnational Financial Network, Inc.*, 07 CV 4125 be adjourned to September 21, 2007 at 2:00 p.m.; and
3. The conferences for all of the remaining matters above be adjourned until September 14, 2007 at 2:00 p.m.

All parties who have appeared or who have otherwise contacted us (defendants in eight of the fifteen cases) have consented to this request. This is the first request for an extension of this deadline.

As to the fifteen litigations, defendants in seven cases are in default, two cases have resulted in active settlement discussions, and the remaining six cases are expected to be contested litigations. We expect to apply for default judgment against the seven defaulting defendants pursuant to the Court's Default Judgment Procedure prior to the adjournment dates requested above.

If the Court has any questions, please do not hesitate to contact me at (212) 912-7417 or Brendan Zahner at (212) 912-7622.

Respectfully submitted,

  
John P. Doherty  
JDoherty@tpw.com

Cc(via facsimile): Peter J. Fazio  
Warren Wynshaw  
Mark Kaufman  
Linden Thomas  
Michael DiChiaro  
Kenneth Bressler  
Gary Harris